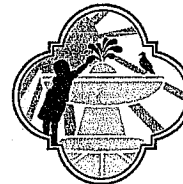


October 8, 2014

Christopher Calfee, Senior Council
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814



CITY OF SAN PABLO

City of New Directions

Dear Christopher Calfee:

The City of San Pablo appreciates the opportunity to provide feedback on the update to Senate Bill 743—*Draft Guidelines for Transportation Impact Analysis in CEQA*. After reviewing the *Text of Proposed New Section 15064.3* and *Text of Proposed Amendments to Appendix F* the City of San Pablo has the following comments:

SB 743 requires OPR to amend the CEQA Guidelines to provide an alternative to level-of-service standards in evaluating transportation impacts. Section 15064.3 contains criteria for analyzing transportation impacts by measuring “vehicle miles traveled” (VMT) and indicates that VMT greater than regional average for the land use type (e.g. residential, employment, commercial) may indicate significant impact. Therefore, it should be required that the agency making the significance determination communicate on an ongoing basis that criteria to the Community Development Agencies, preferably through the Metropolitan Planning Organization. Smaller agencies do not have the transportation modeling software or staff to make these determinations and heavily reliance on regional transportation is required. Further, funding should be set aside to amend planning and local CEQA documents currently in level of service. An ongoing educational component is required for planners to make this transition from level of service to vehicle miles traveled.

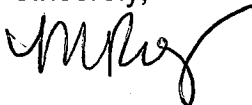
The Methodology in Section 15064.3 specifies that a lead agency may use models to estimate a project's VMT. This methodology lacks sensitivity for local municipalities without modeling capabilities. Local municipalities without such capabilities will have to rely on either county or regional traffic departments to conduct estimates or place the burden on development project applicants, which might discourage land use projects.

As we move toward multi-modal transportation expansion and inclusion of bicycles, pedestrians, and access to public transportation is encouraged. Further, methods of including the reduction in greenhouse gas emissions by project, by corridor, and sub-regions is encouraged. We are unclear how vehicle miles traveled is translated to mixed-use projects, or applied to Planned Development Areas measurement.

Regarding the *Text of Proposed Amendments to Appendix F*, energy. The introduction of the energy section is premature and requires additional detail. There are many forms of energy (methane, wind, water, coal, solar) and this is not defined. Is the section referencing energy generated, lost, captured, re-used? How to measure energy intensiveness is not defined. The section requires how to determine baseline conditions, thresholds of significance, energy projections, and appropriate mitigation measures. The list of mitigation measures are weighed equally, but are not equal and should be ranked by priority in terms of impacts to greenhouse gas reduced.

Thank you for this opportunity to comment. Please contact me at (510) 215-3031 or via email at micheler@sanpabloca.gov if you have questions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Rodriguez', with a stylized flourish at the end.

Michele Rodriguez
Development Services Manager